

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

George N. Bauer
To Call Writer Directly:
(212) 446-4777
george.bauer@kirkland.com

601 Lexington Avenue
New York, NY 10022

(212) 446-4800

www.kirkland.com

Facsimile:
(212) 446-4900

July 6, 2018

By ECF

Honorable Vernon S. Broderick
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Ng Lap Seng, S5 15 Cr. 706 (VSB)

Dear Judge Broderick:

Pursuant to the Court's August 7, 2017, Order, we write on behalf of Mr. Ng Lap Seng to seek approval for Mr. Ng to receive an angiogram test administered by Dr. Michael Attubato at the NYU Langone Health Center at 550 First Avenue, 14th Floor, New York, NY 10016 on Monday, July 9, 2018 at 6:00am. Based on the abnormalities detected in the EKG test conducted at Elitra Health Center and the stress echo test administered at Joan Tisch Women's Center, we understand Mr. Ng may be at risk of unstable plaque and rupture should there be any progression in his symptoms. This angiogram test was recommended by Dr. Eva Kosta to rule out the progression of disease and the need for a stent. Mr. Ng's daughter, Ms. Fei Lan Ng, will accompany Mr. Ng to this appointment.

Under the revised bail order, the defendant has sought the Government's approval for this visit. The Government has consented to the visit on July 9, subject to the conditions set forth below, which Mr. Ng accepts and Guidepost confirms will be met.

1. Should the angiogram detect the need for a stent, and should Mr. Ng's doctors be in a position to place the stent at or around the time of the angiogram, Mr. Ng will consent to them doing so, and will not seek another appointment at a later time for the purpose of placing a stent.
2. Neither the defendant nor any family member, friend, or business associate has a pre-existing business or personal relationship with the medical personnel that the defendant wishes to visit.

KIRKLAND & ELLIS LLP

Honorable Vernon S. Broderick
July 6, 2018
Page 2

3. The defendant agrees that the Government and/or an independent doctor or doctors, of the Government's choosing, may speak with:
 - a) all medical personnel at Elitra Health Center with whom the defendant interacted, and all medical personnel who administered the tests he received or authored the report that was sent to the Government;
 - b) all medical personnel at NYU Langone, or any other medical facility that the defendant may visit in the future, and
 - c) the defendant agrees to execute a HIPPA waiver, if necessary, to facilitate such conversations.
4. The defendant agrees that all records the Government have received to date, and all records the Government will receive in the future, may be shared with:
 - a) an independent doctor or doctors, of the Government's choosing;
 - b) the Court; and
 - c) the Federal Bureau of Prisons.
5. The GPS bracelet shall remain on at all times, and no medical test or procedure shall be performed that would require its removal or that it be turned off or altered or blocked in any way.
6. The security arrangements provided by Guidepost with respect to the Elitra Health Center apply to this visit.
7. The defendant's daughter is also to be searched before and after the visit.
8. Other than the defendant's daughter, no other family member, friend, or business associate shall accompany the defendant.
9. An agent, of the Government's choosing, at the Government's discretion, and without notice to the defendant, may be present for all travel, and the visit itself.
10. The visit must be completed during the hours cleared by Pretrial Services.
11. Guidepost must promptly inform the Government, not just Pretrial Services, of any deviation from the security plan, the timing of visit, the timing of the

KIRKLAND & ELLIS LLP

Honorable Vernon S. Broderick
July 6, 2018
Page 3

defendant's return to his apartment, or any attempt by the defendant or his daughter to violate any condition of bail pending surrender, including but not limited to any attempt by the defendant to use a cellphone or interact with non-medical personnel.

Accordingly, we respectfully request the Court's approval for Mr. Ng to visit NYU Langone Health Center at 550 First Avenue, 14th Floor, New York, NY 10016 on Monday, July 9, 2018 at 6:00am for the purpose of receiving an angiogram test.

We appreciate the Court's consideration of this request.

Respectfully Submitted,

KIRKLAND & ELLIS LLP

By: /s George N. Bauer
George N. Bauer
Kirkland & Ellis LLP
601 Lexington Avenue
New York, NY 10022

cc: Counsel of Record (by ECF)

SO ORDERED

Hon. Vernon S. Broderick
United States District Court
Southern District of New York